**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DONNA CURLING, *et al.*

    Plaintiffs,

    v.

BRAD RAFFENSPERGER, *et al.,*

    Defendants.

CIVIL ACTION

FILE NO. 1:17-cv-2989-AT

<u>DECLARATION OF DR ERIC D. COOMER</u>

Pursuant to 28 U.S.C. § 1746, I, Dr. Eric D. Coomer, make the following

declaration:

1.

My name is Dr. Eric D. Coomer. I am over the age of 21 years, and I am

under no legal disability which would prevent me from giving this

declaration. If called to testify, I would testify under oath to these facts.

2.

I am the Director of Product Strategy and Security for Dominion Voting

Systems ("Dominion"). I was previously the Vice President of U.S.

Engineering for Dominion, and prior to that, I was the Vice President of

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President and CEO, the Poll Pad is certified for use in the following states:
California, Idaho, Indiana, Minnesota, New York, Ohio, Pennsylvania, Texas,
Virginia.

9.

Dominion's optical scanners (ICP) can be used with BMD-marked paper
ballots or hand-marked paper ballots. The ICP units do not interpret the
human-readable (text) portion of either type of ballot. Instead, the ICP units
are programmed to read the QR Code for the BMD ballot or particular
coordinates on hand marked ballot. Please see Exhibit A for a sample of
coordinates on the hand-marked ballot. The target locations are then
correlated to individual choices represented on the ballot. Pre-Logic and
Accuracy Testing (Pre-LAT) is performed each election on every machine to
verify that the target locations on hand-marked ballots, and the barcodes on
BMD-marked ballots correspond correctly to the choices represented on the
ballots and the digital cast-vote-records.

10.

Every ballot (hand-marked, or BMD generated) scanned on a
Democracy Suite tabulator creates a digital image of the front and back of the
ballot. In addition, the tabulators append an AuditMark to each image. The
AuditMark is a text representation of how the tabulator interpreted the

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ballot at scan time. This image can be used to audit the results of the election. Each AuditMark includes information on which tabulator the ballot was scanned. This unique feature of the ImageCast tabulators allows Election Officials to independently audit how the tabulator interpreted the QR Code or hand-marked ballot using a single image of the ballot with the appended AuditMark. It also includes a randomized sequence number when scanned on the ImageCast Precinct Tabulator. This randomized sequence number preserves voter anonymity as there is no way to correlate the sequence number to either an individual voter, or a specific point in time that the ballot was cast. When results and images are stored on the removable memory (Compact Flash cards), no date-timestamp information is included which prevents the ability to recreate the sequence of how the ballots were cast thus preserving voter anonymity.

<div align="center">11.</div>

Any changes to the source code of any component of Democracy Suite would require new certification by the U.S. Election Assistance Commission and the State of Georgia.

<div align="center">12.</div>

The Dominion BMDs being implemented in Georgia do not require calibration in the same way as Georgia's legacy DREs because they do not

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